

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

| | | |
|--------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA |) | Case Number: 2:21cr-00341-DCN-9 |
| |) | |
| vs. |) | |
| |) | MOTION FOR BOND HEARING |
| MAURICE MITCHELL, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

COMES NOW THE DEFENDANT, Maurice Mitchell, by and through his undersigned attorneys, O. Grady Query of Query Sautter & Associates, LLC, and Michael A. Uricchio, hereby moves the Court for release on bond.

In making such Motion, the following information is provided to the Court:

DATE COMMITTED TO JAIL: September 24, 2021
PRESENT BOND: None
OFFENSES: Trafficking Cocaine/10G or more

The Defendant is presently being held in the Charleston County Detention Center where he has been since his arrest on September 24, 2021.

Defendant now seeks consideration of bond based on his special circumstances. The Defendant requires hernia repair surgery and Roper Hospital will schedule same once he is able to provide his availability. Because of a prior surgery he is seeking a non-mesh procedure. He is informed and believes the surgery will be performed by Dr. Blessing.

Upon release, Mr. Mitchell can live with his wife Paulette Mitchell. He requests a personal recognizance bond that allows him to return home as soon possible. He agrees to any and all conditions of bond that the Court finds it appropriate to include in the order since he will be recuperating for approximately three months.

Respectfully submitted,

s/ O. Grady Query
O. Grady Query, Esquire
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Federal Bar No.: 3188

Charleston, South Carolina

May 13, 2022